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July 3, 2024

By ECF

The Hon. Frederic Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: United States v. Joseph Lanni,
23 Cr. 443 (FB)***

Dear Judge Block:

I, along with Frederick L. Sosinsky, Esq., represent Defendant Joseph Lanni in the above-referenced matter. Yesterday, we requested that this Court modify the conditions of Mr. Lanni's pretrial release to permit him to attend milestone birthday parties for his soon-to-be 16-year-old and 21-year-old daughters on July 6, 2024, and July 20, 2024, respectively; an application this Court promptly granted. In hindsight, however, we realize that we had failed to include sufficient travel time for Mr. Lanni to attend the two events within the time frames listed for each party.

Accordingly, we respectfully request that this Court's earlier Electronic Order, dated, July 3, 2024, be modified to permit Mr. Lanni additional time, as determined by PreTrial Services, to travel to/from the July 6, 2024, and July 20, 2024, birthday parties.

We have communicated with PreTrial Services Officer Tara Sarnelli who has informed us that Pretrial Services consents to this additional request. We have also communicated with AUSA Matthew Galeotti who has informed us that the Government likewise has no objection.

As always, we thank Your Honor for your time and consideration.

Respectfully submitted,

/S/

Michael K. Bachrach
Frederick L. Sosinsky
Attorneys for Defendant Joseph Lanni

cc: All parties of record (by ECF)